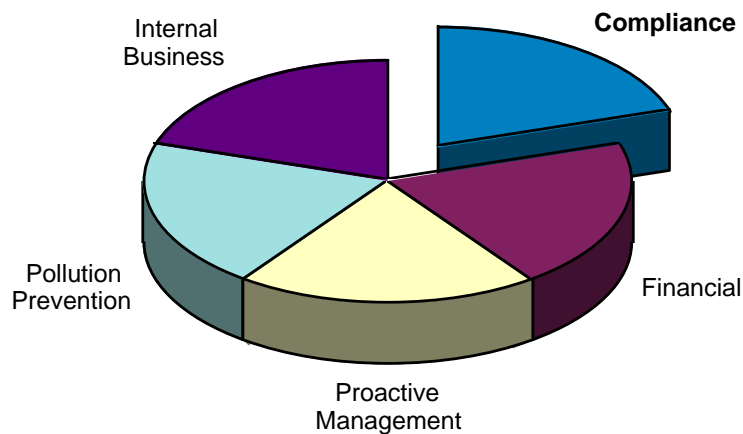


ENVIRONMENTAL PERFORMANCE BALANCED SCORECARD

COMPLIANCE PERSPECTIVE



Section I: Introduction

Being in compliance with legal and regulatory environmental requirements is a basic goal of any environmental program. The Compliance Perspective of the Environmental Performance (EP) Balanced Scorecard provides the basis for determining if the environmental program is in compliance and describes the risk associated with any current or imminent non-compliant conditions.

It encourages activities to proactively identify and correct compliance issues by maintaining a strong self-discovery and a timely and effective correction process that addresses root causes and permanent solutions.

PURPOSE

This environmental compliance metric indicates whether the particular environmental program is currently in full compliance. If not, it tries to answer the question, “so what?” – or, “how bad is it and for how long will it be deficient?”

The Compliance Perspective also describes the *projected* compliance status for the projects and activities needed that are not currently out of compliance (deadlines or requirements have been established by applicable Federal, State and local laws, regulations, Executive Orders (EOs), DoD policies and Final Governing Standards overseas, but deadlines have not passed or requirements are not in force) but shall be if projects or activities are not implemented in time to meet an established deadline beyond the current program year. It serves as a warning signal of imminent compliance failure by identifying compliance requirements that need to be addressed in the near future – “Do I need to make some immediate course or budgetary corrections?”

The Compliance Perspective includes both hard and soft measures, actual quantitative results and qualitative assessment and current status and a “what’s right around the corner” look. Also, it cross checks the other perspectives, such as financial and business, to help balance the entire Environmental Performance Scorecard.

OBJECTIVES

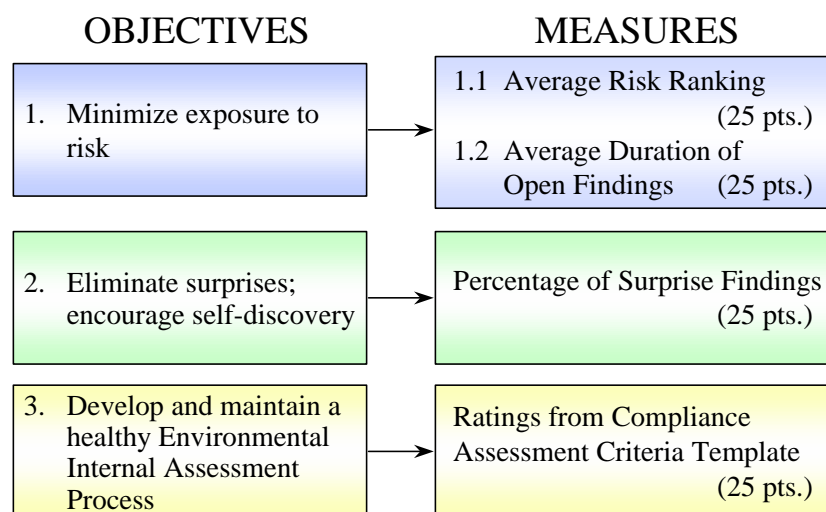
The Compliance Perspective encourages an organization to adopt a strong environmental management ethic that aggressively seeks out to identify, and then rapidly remedy compliance deficiencies in an effective manner. Four objectives have been selected to analyze the compliance status of environmental programs:

OBJECTIVES

1. Minimize exposure to risk.
2. Eliminate surprises; encourage self-discovery.
3. Develop and maintain a healthy Environmental Internal Assessment Process.

In assessing the risk which non-compliance poses, it is not the sheer number of findings, but the risk of negative consequences that truly matters. Reward is given for timely closure and, conversely, penalties are assessed if exposure to risk is lengthy. Reward is also given for self-discovery of problems, and for fixing them right the first time, making sure the root cause is addressed. Further, recognition is given for maintaining a healthy Environmental Internal Assessment process.

Each objective has been translated into specific measures that monitor and evaluate progress toward achieving excellence in environmental programs:



Each measure is worth 25 points, for a possible total of 100 points in the Compliance Perspective.

The first two measures – Level of Risk and Exposure to Risk – focus on results and are based upon the *nature* of compliance findings. Open Class I and II compliance findings (as defined in this perspective) and those closed within the last 12 months are tracked. Risk is assessed, and length of time to close is tracked and projected. Risk is described in terms of Mission Impact, Enforcement Likelihood, and Environmental Impact. Duration is simply measured in months.

The second two measures – “Surprises” and Internal Assessment Health – assess the approach of the compliance management processes, referred to as the “Environmental Internal Assessment Program.” All findings are considered “known” or “surprises.” Open Class I and II findings and those closed within the last 12 months are considered in Measure 3. Full credit is given if there are no surprises. This is the *quantitative* measure of how well an organization self-discovers and corrects problems. Finally, the quality of the internal assessment process is evaluated to provide a *qualitative* measure of how well problems are found and corrected.

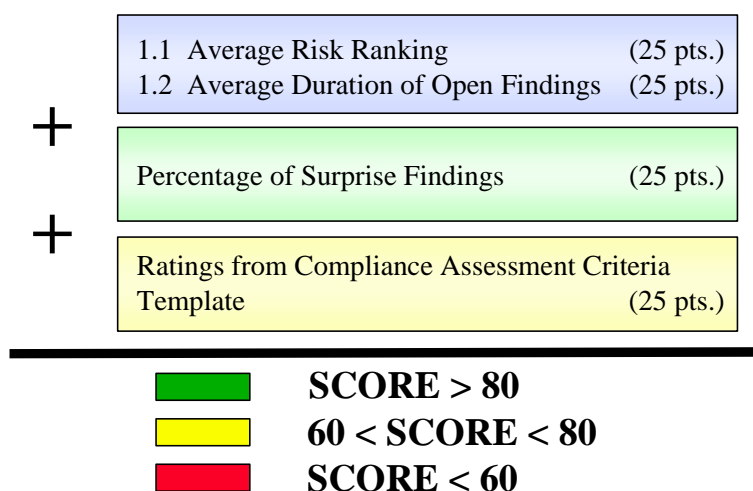
Note that the Compliance Perspective is balanced between approach and results, between how well problems are sought out and found, and how well they are fixed.

How these measurements add up to a red/yellow/green compliance perspective score is discussed in the following section. The construction of each measure, from the component formulas, is also presented.

IF YOU HAVE FINDINGS WHICH ARE DEPENDENT UPON A NAVSEA APPROVED AND PROGRAMMED MILCON FOR RESOLUTION, CALCULATE THIS METRIC TWICE, ONCE FOR THE PROGRAMMED MILCON SITUATIONS AND ONCE FOR EVERYTHING ELSE.

SCORECARD MODEL

Out of a possible 100 Compliance Perspective points, “break points” have been set at 60 and 80. This is based upon compliance being a *minimum, legally mandated requirement*. The “green” level was set high to ensure risks are reported – i.e., Notice of Violations (NOVs) drive the score down to a yellow quickly.



Full compliance all of the time may not be realistic, despite the legal mandates. The U.S. EPA even recognizes this in their Audit Policy. A top notch internal assessment program with a strong compliance audit component, which includes proactive and timely follow-up, is essential in achieving and maintaining compliance and keeping exposure to, and severity of, risk down to a minimum.

This is a tough standard, designed to make Commanding Officers aware of where their environmental risks are so that they can manage them smartly.

Before going into the details of each of the four measures, it is essential to have a common understanding of what a “finding” is. This is particularly important for measures 1 through 3, which evaluate and count findings.

For the purpose of this metric at this time, we are only using Class I and Class II findings.

WHATS A FINDING?

Class I

Projects and activities needed that are currently out of compliance (have received an enforcement action from a duly authorized Federal, State, or local authority; have a signed compliance agreement or received a consent order, and/or have not met requirements based on applicable Federal, State, local laws, regulations and Executive Orders (EOs), DoD policies, and Final Governing Standards overseas). This class also includes projects and activities needed that are not currently out of compliance, (deadlines or requirements have been established by applicable requirements, but deadlines have not passed or requirements are not in force) but shall be if projects or activities are not implemented within the current program year. Those activities include the preparation of plans (e.g., National Environmental Policy Act, 42 U.S.C. 4321-4370(d) (reference (l)) documentation, master plans, emergency response plans, integrated natural and cultural resource management plan, pollution prevention plans, etc.) opportunity assessments and inventories. The preferred approach is to use pollution prevention projects or activities, if cost effective, to bring a facility into compliance. Overseas, that class includes projects and activities necessary to alleviate the human health threats to ongoing operations or necessary to comply with applicable treaties and agreements.

Class II

Projects and activities needed that are not currently out of compliance (deadlines or requirements have been established by applicable Federal, State and local laws, regulation, Executive Orders (EOs), DoD policies and Final Governing Standards overseas, but deadlines have not passed or requirements are not in force) but shall be if projects or activities are not implemented in time to meet an established deadline beyond the current program year. The preferred approach is to use pollution prevention projects or activities, if cost effective, as the means of maintaining or bringing a facility into compliance. Overseas, that class includes projects and activities identified using risk based prioritization practices that meet the long term objective of full implementation of the Final Governing Standards for each foreign country where DoD maintains substantial installations.

The above Class I and II findings’ definitions were derived from DoD Instruction 4715.6. These definitions do not distinguish the relative importance, relative impact to the environment or relative risk of potential findings. In other words these definitions imply that *all findings are created equal*. The findings tracked in this metric include findings levied by an internal Yet, we realize that with limited time and money, we must set priorities. Measure #1, the Risk Measure, considers the key parameters for each finding that can help the Environmental Manager prioritize corrective actions.

Categories:

The Category allows the finding to be classified based on the level of effort required to close the finding. The categories were chosen to represent the typical time required to resolve findings. The category for the finding should be based on the description that applies.

Category	Description	Category Duration (Months)	Class I Applicable	Class II Applicable
Immediate	Found during routine inspections, usually single occurrence items, short term, administrative findings, virtually no cost. Require less than 1 month to correct.	1	Yes	No
Minor	Found during inspections, usually single occurrence items, short term, low cost fixes, administrative findings. Would normally require not more than 3 months to fix.	3	Yes	Yes
Moderate	Programmatic findings, require complex solutions, require equipment purchase and/or contractor services, require written program management plans, permit applications or compliance actions, require personnel training, environmental review/assessment documentation. Would normally require not more than 12 months to fix.	12	Yes	Yes
Major	Long term findings, major program plans, major permit applications/renewals, plans/permit requiring regulatory review, MINCONs, Capital Equipment required to fix. Major expenditure of funds required to fix. Would normally require more than one year to fix. Optimally, duration time should not exceed 18 months.	18	Yes	Yes
Agreement	Arise from major deficiencies found during regulatory inspections that lead to a signed consent/compliance agreement or some document or letter denoting an agreement with the regulatory agency. The time to correct is calculated from the date the agreement is signed until the agreed upon completion date.	Agreement	Yes	No

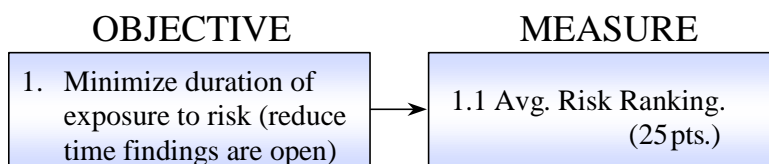
For purposes of this Compliance Perspective, begin tracking a Class II finding from the Compliance Deadline date minus the number of months for the Category Duration, e.g. 12 months prior to the deadline for a Moderate Class II and 18 months prior to the deadline for a Major Class II. Also, note that by definition, a Class II finding becomes a Class I finding at the beginning of the fiscal year in which it would become non-compliant if the corrective action were not implemented.

Scoring Calculations Methodology

Objective 1.1 Minimize Environmental Risk

The first objective measure is the Average Risk Ranking of Open Class I and II Findings or those closed within the past year. The intent is to describe the ramifications of the non-compliance documented for the last year. Will the organization's mission be impacted or halted? Will this result in a pending or potential enforcement action? Is there a possibility to damage the environment or resources (i.e., natural and cultural)?

Risk Definitions are provided in this manual as a guide to help you assess risk. However, when making decisions about risk, the Environmental Manager, should ultimately rely upon knowledge, judgment and experience.



SCORE	RISK LEVEL
100%	No Risk (i.e., no open findings)
95%	Deminimus Risk
80%	Low Risk Level
40%	Medium Risk Level
0%	High Risk Level

NO: The highest possible ranking should be given.

Example: Lacking a Natural Resources Plan may be administrative - or it could mean you lack basic information to ensure you are not damaging endangered species habitat. Such a finding should therefore be designated Medium Risk rather than Low Risk. Refer to the Environmental Compliance Risk Criteria for guidance in assigning risk score.

This calculation is a simple average of the risk ranking given to each Class I and II finding in three categories: Mission Impact, Enforcement Likelihood, and Environmental Impact. The categories are based upon what Commanding Officers and others have asked in the past to get a feel for the severity of a situation. Definitions for what constitutes a high, medium, low risk, or deminimus risk have been developed as follows. Remember, these definitions are a guide to assist you.

Environmental Compliance Risk Criteria

♦ Mission Impact

The potential to stop or adversely impact a core mission function.

High	Potential to stop a core function and disable mission performance.
Medium	Potential to seriously impede a core function or stop a key support function and adversely impact mission accomplishment.
Low	Potential to stop work in non-core areas.
Deminimus	Improbable that any core or support function would be affected.

♦ Enforcement Probability

The potential for adverse regulatory actions.

High	Agency has authority to issue Notice of Violations (NOV) and file civil and/or criminal enforcement actions <u>and</u> routinely inspects the activity (i.e., annually) <u>or</u> has issued a NOV in the past 12 months for this or similar non-compliant operations .
Medium	Agency has authority but either has not inspected <u>or</u> has not taken action in the past for similar operations.
Low	Agency has limited authority <u>and</u> no known track record of taking action.
Deminimus	Agency has no enforcement authority.

♦ Impact to the Environment

Potential for adverse environmental effects.

High	Release or damage to the environment or the resources (i.e., endangered species/archaeological sites) has or is occurring.
Medium	Threatened release or likely damage to the environment or the resources (i.e., endangered species/archaeological sites) exists.
Low	Moderate or major administrative requirement <u>and</u> no threatened or actual damage to the environment are present.
Deminimus	Minor administrative requirement <u>and</u> no threatened or actual damage to the environment are present.

When each Class I and II finding is discovered and recorded, it is rated to have a high, medium, low, or deminimus chance that it will impact each of these three areas.. The measure is calculated by determining the average of the areas of risk for each finding. Three scores are given for each finding and the average of the three individual scores gives the overall risk score for each finding, and then computing the overall average risk. The overall average risk score is then converted to a percentage and multiplied by the maximum of 25 points. The risk levels are as follows:

95	=	Deminimus Risk
80	=	Low Risk
40	=	Medium Risk
0	=	High Risk

A maximum of 25 points may be obtained if the activity has no risk. To have no risk there must be no findings reported.

Scoring

- Step 1 List every Class 1 and 2 Finding
- Step 2 Using the Risk Criteria Guide, determine the risk of each finding to the Mission. Determine the risk of each finding of enforcement. Determine the impact of each finding on the Environment.
- Step 3 Using the percentages assigned to each risk category, calculate the average of risks of each finding.
- Step 4 Then average the averages to calculate overall risk

$$\text{Overall Risk} = \frac{\text{Average Risk of Each Finding}}{\# \text{ of Findings}}$$

- Step 5 Multiply Overall Risk X 35 points

Example of the Calculation

Finding	Category	Mission		Enforcement		Impact		Overall Risk for Each Finding (Avg)
		Risk	Percent	Risk	Percent	Risk	Percent	
A	Minor	Deminimus	95	Deminimus	95	Low	80	90
B	Moderate	Low	80	Deminimus	95	Low	80	85
C	Major	Low	80	Medium	40	Low	80	67
D	Agreement	High	0	High	0	Medium	40	13
Overall Average Risk								64

AVERAGE RISK SCORE = Average Overall Risk/100 (No Risk) * 25 points = .64*25 = 16 points

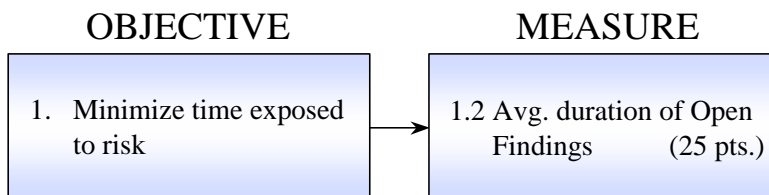
MILCON Calculation Example (Separate MILCON Score)

Finding	Category	Mission	Enforcement	Impact	Overall Risk (Avg)
E	MILCON Programmed	40	80	40	53

AVERAGE RISK SCORE = Average Overall Risk/ 100 (No Risk) * 25 points = .53*25 = 13.25 points

Objective 1.2 Minimize Time Exposed to Risk

The second objective measure, Duration exposed to risk addresses the goal to minimize the length of time an activity is exposed to a non-compliant situation, or risk. It is geared to motivate timely closure of findings.

**SCORING**

Score	Duration Findings Are Open				
Full Credit = Overall Risk for Each Finding	Immediate (Class I) 1 month	Minor (Class I) 3 months	Moderate 12 months	Major 18 months	Agreement [agreement ECD – date of finding]
Overall Risk *	If findings are closed within their category duration.				
+10 points	Extra points for early closure, 10 per month.				
-10points	Points deducted for late closure, 10 per month with <u>no limit</u> on amount deducted.				

* Use overall risk for each finding calculated in Measure 1.

The Duration (Actual Months) is the number of months it took to close a finding. A finding is considered closed when the corrective actions to permanently resolve the non-compliant finding is completed, even if administrative close out through a regulatory agency takes longer.

The Duration (Actual Months) for a finding that is open is recorded from the Plan of Actions and Milestones (POA&M). The purpose of the measure is to indicate that findings are being managed in an appropriate manner, therefore the planned actions and completion dates are used. The POA&M should be updated if milestones are missed and completion dates revised when necessary and revised information used in the metric.

Note: The maximum score for each individual finding is 100 points. Score may be negative for each individual finding as well as the overall score. Cannot score above 25 points for an overall score.

NOTE: The objective is to set an excellent standard. All findings should be closed in an appropriate timeframe. No limit is set on loss of points. If lack of funding is an issue, then the metric will raise it to the Admiral's level or innovation will be encouraged to arrive at an alternate solution that permanently resolves the finding.

A finding is considered closed when the corrective action to permanently resolve the non-compliant finding is completed, even if administrative close out through a regulatory agency takes longer.

The method for calculating the Duration score for sample finding "B" is as follows:

Example

All open findings and all findings closed in past 12 months - Compute average duration each finding was open in months and convert to % score using the above scoring table.

Duration 11 months; Moderate; 85% risk
12 months-11 months = 1 month ahead of schedule
 $85\% + 10\% = 95\%$

=	Average Duration Score for all findings (see next page)	38.8% = .90
X 25 pts.		
=	Final Duration Score	.388 x .25 = 9.7 pts.

Example of the Calculation

Finding	Category	Category Duration Mos.	Duration Actual Mos.	Overall Risk for Each Finding *	Category Duration Minus Duration Award/ Penalty	Score for Time Exposed to Risk **
A	Minor	3	4	90	-10	80
B	Moderate	12	11	85	+10	95
C	Major	18	24	67	-60	7
D	Agreement	36	40	13	-40	-27
Average Duration Score						38.8

* These are the RiskPoints calculated for the findings in Objective 1.

** Risk Points plus Award/Penalty = Score for Time Exposed to Risk

TIME EXPOSED TO RISK SCORE = Average Time Exposed to Risk Score/ 100 (No Risk) * 25 points = .388 x 25 points = 9.7 points

MILCON Calculation Example (Separate MILCON Score)

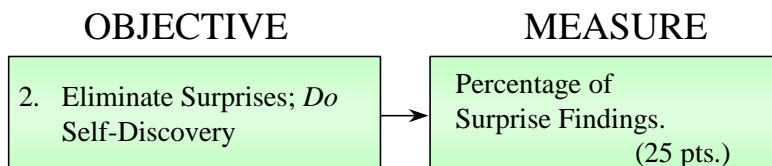
Finding	Category	Mission	Enforcement	Impact	Overall Risk (Avg)
E	MILCON Programmed	40	80	40	53

MILCON is closed one month late

AVERAGE RISK SCORE=Average Overall Risk/ 100 (No Risk) * 25 points = $53/100 * 25 = 13.25$ – 10 for lateness = 3.25

Objective 2: Eliminate Surprises; Do Self-Discovery

This objective is a quantitative measure of how well an activity identifies and permanently corrects environmental deficiencies. The intent is to seek out and correct all deficiencies and avoid all surprise findings. The methodology for calculating the score is presented in the illustration below.

**SCORING**

$$\text{SCORE} = \frac{(\# \text{ ALL Findings} - \# \text{ "Surprises"})}{\text{Total ALL Open Findings}}$$

WHERE: "SURPRISES" = REPEAT + RECURRING + UNCOVERED

Finding Type	Definition
Repeat	Found during a previous inspection/assessment but no POA&M or corrective action plan exists. (SURPRISE)
Recurring	Found during a previous inspection. The corrective action was implemented and the finding closed. On a subsequent inspection, the same finding occurred again in the same area. Indicates that the root cause was not addressed the first time. (SURPRISE)
Uncovered	Discovered by an external regulator or during a self inspection. Finding would have been present at the time of a prior self-inspection/assessment BUT went unnoticed at that time. (SURPRISE)
Outstanding	Found during a previous inspection/assessment. A POA&M/corrective action plan is being actively worked. (NOT A SURPRISE)
New	Not found during a previous inspection/assessment AND would not have been present at that time. (NOT A SURPRISE)

Example of the Surprise Calculation

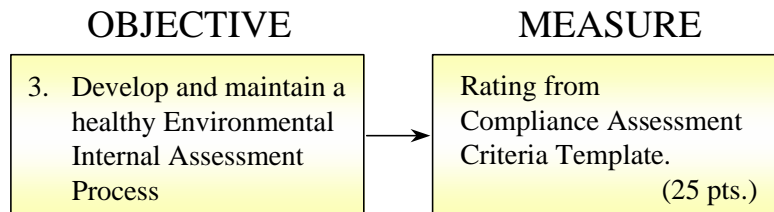
Finding	Surprise (Y/N)	Value
A	No	0
B	No	0
C	No	0
D	Yes	1
Total Yes (Surprises)		1
Total findings		4
Total findings minus total Y =		3
Percentage of Findings that are Not Surprises		75%
Surprise Score		18.8

Objective 3: Develop and maintain a healthy Environmental Internal Assessment Process

This objective will help encourage the development and implementation of a comprehensive and mature annual Internal Assessment process. Internal assessments are effective tools for ensuring an understanding of compliance requirements, status of actual compliance and the capability for consistent compliance. Full compliance with all applicable requirements has always been the bedrock of an activity environmental program. However, to achieve and monitor a healthy and well balanced Environmental Program, an internal assessment must evaluate not just compliance but the other necessary elements that lead to continuous improvement of environmental performance and promote progress toward total alignment with the command's mission, vision, strategic plan and business processes. Even though this measure falls within the Compliance Perspective of our Balanced Scorecard, the criteria in this measure are comprehensive because every Environmental Program Manager should conduct an annual Environmental Internal Assessment in accordance with the Naval Sea Systems Command guidance of 10 August 1998. This comprehensive internal assessment should evaluate programs based on five elements that form the basis of an effective and compliant environmental program. Note that compliance is only a part of the "big picture". The five elements are:

Leadership
Compliance and Business Processes
Proactive Management and Community Trust
Pollution Prevention
Resources and Training

The standards of measurement for the Environmental Internal Assessment may include Malcolm Baldrige Criteria and best business practices; **but must include all regulatory requirements.**



SCORING

Scores based upon answers to each question:

- YES, and fully meets criteria = 10 pts.
- YES, partially meets or does not fully meet criteria = 5 pts.
- NO, or substantially does not meet criteria = 0 pts.

Criteria	Score (0, 5, or 10 Points)
1. Do you perform an Environmental Internal Assessment of all program areas at least annually to identify best management practices, areas for improvement and areas of non-compliance?	
2. Do you have a written assessment plan, approved by Management, that includes a provision for an ongoing evaluation of the program's compliance posture and identifies opportunities for process improvements?	
3. Does your written assessment plan include protocols for a comprehensive compliance posture evaluation, which include all applicable environmental requirements (federal, state, local, and Navy) for your activity? For example, do you have a compliance audit checklist tailored to your programs?	
4. Are the examiners conducting the assessment knowledgeable about the environmental media they are assessing and are they trained in audit techniques?	
5. Is the assessment being conducted by other than the actual program managers to ensure objectivity and enhance the process by creating opportunities to Share information, increase knowledge and broaden perspectives?	
6. Are the examiners spending approximately 50% of the assessment time reviewing programs that can be observed in the field? Do the examiners ask for senior and mid-level managers' input and participation during the assessment?	
7. Is there a POA&M for each finding and does each POA&M clearly identify the necessary corrective action. Does each POA&M outline the steps, assign responsibility, establish a schedule and identify funding and resources to correct the deficiency or implement the process improvement?	
8. When applicable, does each POA&M address short and long term goals, short-term goals to correct the non-compliance and long term to correct the root cause by applying lessons learned, developing process improvements, and emphasizing opportunities for pollution prevention?	
9. Is a written report that identifies and provides root cause analysis of deficiencies, and includes a set of POA&Ms endorsed by the Commanding Officer, or chain of command and copies made available to senior managers and tenants as necessary.	
10. Are the POA&Ms implemented on time and within budget, plus or minus 10%?	
Total Points (max = 100)	

$$\text{SCORE} = \frac{\text{Total Points}}{100} \times 25 \text{ pts.}$$

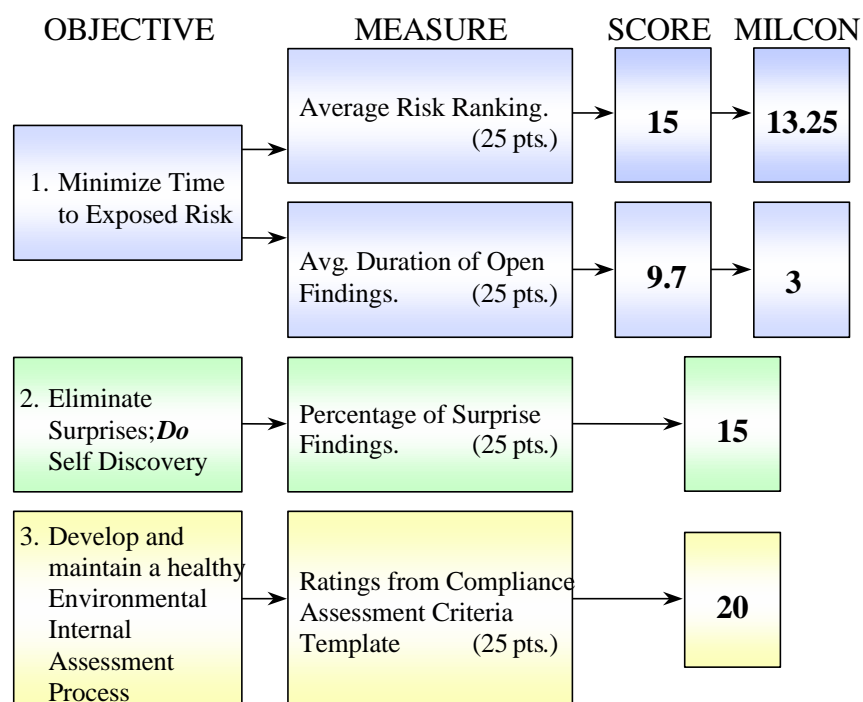
Sample Calculations and Worksheet


Criteria		Score (0, 5, or 10 Points)
1.	Do you perform an Environmental Internal Assessment of all program areas at least annually to identify best management practices, areas for improvement and areas of non-compliance?	5
2.	Do you have a written assessment plan, approved by Management, that includes a provision for an ongoing evaluation of the program's compliance posture and identifies opportunities for process improvements?	10
3.	Does your written assessment plan include protocols for a comprehensive compliance posture evaluation, which include all applicable environmental requirements (federal, state, local, and Navy) for your activity? For example, do you have a compliance audit checklist tailored to your programs?	10
4.	Are the examiners conducting the assessment knowledgeable about the environmental media they are assessing and are they trained in audit techniques?	5
5.	Is the assessment being conducted by other than the actual program managers to ensure objectivity and enhance the process by creating opportunities to Share information, increase knowledge and broaden perspectives?	10
6.	Are the examiners spending approximately 50% of the assessment time reviewing programs that can be observed in the field? Do the examiners ask for senior and mid-level managers' input and participation during the assessment?	10
7.	Is there a POA&M for each finding and does each POA&M clearly identify the necessary corrective action. Does each POA&M outline the steps, assign responsibility, establish a schedule and identify funding and resources to correct the deficiency or implement the process improvement?	5
8.	When applicable, does each POA&M address short and long term goals, short-term goals to correct the non-compliance and long term to correct the root cause by applying lessons learned, developing process improvements, and emphasizing opportunities for pollution prevention?	10
9.	Is a written report that identifies and provides root cause analysis of deficiencies, and includes a set of POA&Ms endorsed by the Commanding Officer, or chain of command and copies made available to senior managers and tenants as necessary.	10
11.	Are the POA&Ms implemented on time and within budget, plus or minus 10%?	10
Total Points (max = 100)		85



$$\text{SCORE} = 85/100 * 25 = 21.25$$

Sample Final Activity Scorecard

A sample of the final activity scorecard for the Compliance Perspective is provided below.



Compliance Perspective "Scorecard" =  = 61

Compliance Perspective MILCON "Scorecard" =  = 51 

Red

To calculate the total score for the Compliance Perspective:

- Add up points from each of the four objective and review criteria to determine overall compliance perspective score.
- If you have the points AND meet the criteria listed below, you earn the score.

Points	Criteria	Score
> 95	<ul style="list-style-type: none"> • Open <i>risk is negligible</i>, AND; • Average time to close findings is \leq <i>prescribed months</i>, AND; • <i>All</i> findings are <i>self-discovered</i>. 	Gold Star
80 – 94	<ul style="list-style-type: none"> • Open <i>risk is acceptable</i>, AND; • Average time to close findings is <i>slightly</i> > <i>prescribed months</i>, AND; • At least <i>80%</i> of findings are <i>self-discovered</i>. 	Green
60 – 79	<ul style="list-style-type: none"> • Does <i>not</i> meet <i>all</i> the criteria for "green" • Does <i>not</i> meet <i>any</i> of the criteria for "red" 	Yellow
< 60	<ul style="list-style-type: none"> • Open risk is <i>not acceptable</i>, <i>OR</i>; • Average time to close findings is > <i>12 months</i>, <i>OR</i>; • <u>Less than 60%</u> of findings are <i>self-discovered</i>. 	Red

Objective		Measure	Possible Score	Actual Score
1	Minimize Risk	Average Risk Ranking	25	
		Average Duration Findings are Open	25	
2	Eliminate Surprises: Do Self Discovery	Percentage of Surprise Findings	25	
3	Develop & Maintain a healthy Environmental Internal Assessment Process	Ratings from Compliance Assessments Criteria Template	25	
Totals			100	0

Points	Criteria	Score
> 95	<ul style="list-style-type: none"> Open <i>risk is negligible</i>, AND; Average time to close findings is \leq <i>prescribed months</i>, AND; <i>All</i> findings are <i>self-discovered</i>. 	Gold Star
80 – 94	<ul style="list-style-type: none"> Open <i>risk is acceptable</i>, AND; Average time to close findings is <i>slightly</i> > <i>prescribed months</i>, AND; At least <i>80%</i> of findings are <i>self-discovered</i>. 	Green
60 – 79	<ul style="list-style-type: none"> Does <i>not</i> meet <i>all</i> the criteria for “green” Does <i>not</i> meet <i>any</i> of the criteria for “red” 	Yellow
< 60	<ul style="list-style-type: none"> Open risk is <i>not acceptable</i>, <i>OR</i>; Average time to close findings is > <i>12 months</i>, <i>OR</i>; <i>Less than 60%</i> of findings are <i>self-discovered</i>. 	Red

Example

Objective		Measure	Possible Score	Actual Score	MILCON Score
1	Minimize Risk	Average Risk Ranking	25	16	13.25
		Average Duration Findings are Open	25	9.2	
2	Eliminate Surprises: Do Self Discovery	Percentage of Surprise Findings	25	18.25	
3	Develop & Maintain a healthy Environmental Internal Assessment Process	Ratings from Compliance Assessments Criteria Template	25	21.25	
Totals			100	64.7	13.25

Final Score is Yellow

Section II - Reporting the Scorecard Results

Ultimately, the results of measuring a site's performance against the scorecard measures and scoring criteria will produce a scorecard summary that looks like this:

Financial Prevention	Pollution Management	Proactive Business	Internal	Compliance
<div> <div>Yellow</div> <div>Green</div> <div>MILCON</div> </div>	Green	Red	Yellow	<div> <div>Yellow</div> <div>Red</div> <div>MILCON</div> </div>

However, this summary sheet, while intelligible to people who have worked closely with the scorecard, will be difficult for other managers and activity leadership to interpret. The following is a proposed briefing structure that can be used by environmental staff.